

From: Norman Pedersen <npedersen@hanmor.com>
Sent: Thursday, July 11, 2019 4:02 PM
To: Aliso
Subject: SCPOU comment in support of the revised Aliso Canyon Withdrawal Protocol:
Attachments: 2019-07-01 AlisoCanyonWithdrawalProtocol-Draft-2019-07-01.pdf; 2019-07-01 AlisoCanyonWithdrawalProtocol-ProposedRevisions-2019-07-01.pdf

To Energy Division:

The Southern California Publicly Owned Utilities ("SCPOU") support the July 1, 2019 draft Aliso Canyon Withdrawal Protocol to replace the November 2, 2017 Withdrawal Protocol. The members of SCPOU are Anaheim, Burbank, Glendale, Pasadena, and Vernon.

The November 2, 2017 Withdrawal Protocol limits Aliso Canyon to being an "asset of last resort" after all other alternatives have been exhausted. The revised Withdrawal Protocol would permit SoCalGas to withdraw gas from Aliso Canyon for balancing or for scheduling to entities who both serve core customers and own storage rights if any one of three conditions are met:

1. Preliminary low Operational Flow Order (OFO) calculations for any cycle result in a Stage 2 low OFO or higher for the applicable gas day;
2. Aliso Canyon is above 70% of its maximum allowable inventory between February 1 and March 31, in which case SoCalGas may withdraw from Aliso Canyon until inventory declines to 70% of its maximum allowable inventory; and/or
3. The Honor Rancho and/or Goleta fields decline to 105% of their month-end minimum inventory requirements during the winter season.

Although more liberal than the "last resort" restriction on the use of Aliso Canyon, the three conditions are still restrictive. In the July 1, 2019 statement of reasons for the revised Withdrawal Protocol, the Energy Division states that "the proposed revisions would provide SoCalGas with more flexibility to consider withdrawals from Aliso Canyon on days when the storage field's inventory is needed for gas system balancing and/or when the inventory of other non-Aliso storage fields in Southern California have substantially declined." Additionally, the Energy Division states that "revising the Aliso Canyon Withdrawal Protocol will help preserve inventory levels at the non-Aliso storage fields, increase their corresponding withdrawal capacity, and enable those fields to supply gas when needed at critical hours of peak customer demand." SCPOU urge the Energy Division to consider further liberalization of the Withdrawal Protocol as necessary to assure those objectives are met.

Best Regards,

Norman

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